

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

---

)  
) Chapter 11  
)  
) Case No. 22-10943 (MEW)  
)  
) (Jointly Administered)  
)

---

**STIPULATION AND AGREED ORDER  
EXTENDING GOVERNMENTAL BAR DATE FOR THE STATES**

---

**WHEREAS**, on July 5, 2022 (the “Petition Date”), each Debtor filed a voluntary petition for relief under chapter 11 of title 11 (as amended, the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”);

**WHEREAS**, by Order dated August 3, 2022, [Docket No. 218] (the “Bar Date Order”), the Court set January 3, 2023 (the “Governmental Bar Date”) as the deadline by which a governmental unit, as defined in section 101(27) of the Bankruptcy Code, must file proofs of claim in these chapter 11 cases.

**WHEREAS**, all states are governmental units (collectively, the “States”) within the meaning of section 101(27) of the Bankruptcy Code.

**WHEREAS**, the Parties have agreed, subject to the approval of the Bankruptcy Court, to an extension of the Governmental Bar Date for the States.

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

Based on the foregoing stipulation of the parties, it is ORDERED that:

1. The Government Bar Date for the States shall be January 17, 2023, or such later date as may be ordered by the Court, without prejudice to the States' rights to seek further extensions of the date.

IT IS SO ORDERED.

Dated: New York, New York  
January 9, 2023

/s/ **Michael E. Wiles**

THE HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE

**AGREED TO BY:**

By: /s/ Karen Cordry  
Karen Cordry  
Bankruptcy Counsel  
National Association of Attorneys General  
1850 M St., NW, 12<sup>th</sup> Floor  
Washington, DC 20549  
Telephone: (301) 933-3640  
Email: kcordry@naag.org

*Counsel for the NAAG member states and  
the Alabama Securities Commission*

**AGREED TO BY:**

By: /s/ Abigail R. Ryan  
ABIGAIL R. RYAN  
Texas State Bar No. 24035956  
LAYLA MILLIGAN  
Texas State Bar No. 24026015  
ROMA DESAI  
S.D.N.Y. Bar No. RD8227  
Texas Bar No. 24095553  
Office of the Attorney General of Texas  
Bankruptcy & Collections Division  
P. O. Box 12548  
Austin, Texas 78711-2548  
Telephone: (512) 463-2173  
Facsimile: (512) 936-1409  
Email: abigail.ryan@oag.texas.gov  
Layla.milligan@oag.texas.gov  
Roma.desai@oag.texas.gov

*Counsel for the Texas Department of  
Banking and the Texas State Securities  
Board*

**AGREED TO BY:**

By: /s/ Joshua A. Sussberg  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS**  
**INTERNATIONAL LLP**  
Joshua A. Sussberg, P.C.  
Christopher Marcus, P.C.  
Christine A. Okike, P.C.  
Allyson B. Smith (admitted *pro hac vice*)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: jsussberg@kirkland.com  
cmarcus@kirkland.com  
christine.okike@kirkland.com  
allyson.smith@kirkland.com

*Counsel for the Debtors*